

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Cr. No. 24-20145-JTF

LISA J. FINDLEY,

Defendant.

OBJECTION TO GOVERNMENT'S REQUEST FOR DETENTION

Comes now the defendant, Lisa Findley, by and through appointed counsel, Tyrone J. Paylor, and lodges an objection to the Government's request to detain Ms. Findley pretrial on the allegation that this matter involves a serious risk that she will flee pursuant to 18 U.S.C. 3142(f)(2)(A). The Defense requests that the Court order the Government to establish a proper basis for requesting pretrial detention.

Respectfully submitted,

DORIS RANDLE-HOLT
FEDERAL DEFENDER

s/ Tyrone J. Paylor
First Assistant Federal Public Defender
200 Jefferson, Suite 200
Memphis, TN 38103
(901) 544-3895

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was forwarded via the Court's electronic filing system to the Assistant United States Attorney assigned this matter.

This 16th day of September 2024.

s/ Tyrone J. Paylor
First Assistant Federal Defender